

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
CHARLOTTESVILLE DIVISION**

BRENNAN M. GILMORE,

Plaintiff,

v.

ALEXANDER E. (ALEX) JONES, et al.,

Defendants.

No. 3:18-cv-00017-NKM-JCH

STIPULATION AND ORDER

WHEREAS, Plaintiff Brennan Gilmore (“Gilmore”) sued Defendant R. Scott Creighton for defamation in connection with the publication of “Charlottesville Attack, Brennan Gilmore and...the STOP KONY 2012 Pysop? What?” and “Charlottesville Attack – Brennan Gilmore: Witness or Accessory”, each published on August 13, 2017 (the “Publications”);

WHEREAS, the Publications contained language pertaining to Gilmore and the August 2017 Unite the Right rally;

WHEREAS, Creighton does not contest Gilmore’s allegation of defamation;

WHEREAS, the parties desire to amicably resolve all claims arising out of this action;

WHEREAS, Gilmore and Creighton, having entered into a settlement agreement, hereby stipulate as set forth below to the entry of an order in this action:

IT IS ORDERED, ADJUDGED, AND DECREED as follows:

1. This Court has jurisdiction over the subject matter of the above action and has personal jurisdiction over the parties for purposes of this action and as set forth in Paragraph 3 below.

2. Creighton admits that the Publications were defamatory.

3. Gilmore and Creighton agree that this Court will retain jurisdiction to enforce the terms of the parties' settlement agreement and to enforce and resolve any disputes related thereto, if necessary.

4. This action and all defenses thereto with respect to Gilmore and Creighton are hereby dismissed with prejudice and without costs, disbursements, or attorneys' fees to any party.

/s/ Hassen A. Sayeed

Jonathan Hacker, admitted *pro hac vice*
D. Sean Trainor, (VSB #43260)
Anwar L. Graves, admitted *pro hac vice*
Rahul Kohli, admitted *pro hac vice*
Kendall Collins, admitted *pro hac vice*
O'MELVENY & MYERS LLP
1625 Eye Street, N.W.
Washington, D.C. 20006
Telephone: (202) 383-5300
Facsimile: (202) 383-5414
jhacker@omm.com
dstrainor@omm.com
agraves@omm.com
rkohli@omm.com
kcollins@omm.com

Hassen A. Sayeed, admitted *pro hac vice*
Chani C. Gatto-Bradshaw, admitted *pro hac vice*
James Yi Li, admitted *pro hac vice*
O'MELVENY & MYERS LLP
Times Square Tower 7
Times Square
New York, New York 10036

/s/ R. Scott Creighton

R. Scott Creighton
9214 13th Street N, Apt A
Tampa, FL 33612
rscdesigns@tampabay.rr.com

Pro Se

Telephone: (212) 326-2000
Facsimile: (212) 326-2061
hsayeed@omm.com
cgatto-bradshaw@omm.com
jli@omm.com

Kimya Saied, admitted *pro hac vice*
O'MELVENY & MYERS LLP
Two Embarcadero Center
28th Floor
San Francisco, CA 94111-3823
Telephone: (415) 984-8700
Facsimile: (415) 984-8701
ksaied@omm.com

Aderson Francois, admitted *pro hac vice*
CIVIL RIGHTS CLINIC GEORGETOWN
UNIVERSITY LAW CENTER
600 New Jersey Avenue, N.W.
Washington, D.C. 20001
Telephone: (202) 662-9065
Aderson.Francois@georgetown.edu

Elizabeth B. Wydra, admitted *pro hac vice*
Brienne J. Gorod, admitted *pro hac vice*
CONSTITUTIONAL ACCOUNTABILITY
CENTER
1200 18th Street, N.W., Suite 501
Washington, D.C. 20036
Telephone: (202) 296-6889
elizabeth@theusconstitution.org
brienne@theusconstitution.org

Attorneys for Plaintiff

SO ORDERED this ____ day of _____, 2022.

NORMAN K. MOON
SENIOR UNITED STATES DISTRICT JUDGE

CERTIFICATE OF SERVICE

I hereby certify that on this 18th day of April 2022, a copy of the foregoing document was served on all parties via the Court's Electronic Case Filing system, and separately sent via electronic mail to Mr. Lee Stranahan and Mr. R. Scott Creighton.

/s/ Hassen A. Sayeed

Hassen A. Sayeed